

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
KELSEY J. HELLAND (CABN 298888)
Assistant United States Attorney
U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
(415) 436-7200
kelsey.helland@usdoj.gov

ERIC HAMILTON
Deputy Assistant Attorney General
DIANE KELLEHER
Branch Director
CHRISTOPHER HALL
Assistant Branch Director
JAMES D. TODD, JR.
Senior Trial Counsel
YURI S. FUCHS
Trial Attorney
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, DC 20044
james.todd@usdoj.gov
yuri.s.fuchs@usdoj.gov

Counsel for Defendants

Additional counsel on signature page

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**STIPULATION AND ~~PROPOSED~~
ORDER GRANTING DEFENDANTS'
ADMINISTRATIVE MOTION TO
REMOVE INCORRECTLY FILED
DOCUMENTS (DKT. NOS. 35, 36)**

Pursuant to Civil Local Rule 7-12, the parties hereby stipulate and respectfully request that the Court grant Defendants' Administrative Motion to Remove Incorrectly Filed Documents and remove the documents filed at Dkt. Nos. 35 and 36 from the public docket. As set forth in the Administrative Motion, the documents to be removed inadvertently contained the PII of a third-party. Replacement documents have been filed, and all parties agree to the removal of the previously filed versions.

DATED: March 7, 2025

Respectfully submitted,

PATRICK D. ROBBINS
Acting United States Attorney

/s/ Kelsey J. Helland¹
KELSEY J. HELLAND
Assistant United States Attorney

ERIC HAMILTON
Deputy Assistant Attorney General
DIANE KELLEHER
Branch Director
CHRISTOPHER HALL
Assistant Branch Director
JAMES D. TODD, JR.
Senior Trial Counsel
YURI S. FUCHS
Trial Attorney

Counsel for Defendants

Scott A. Kronland
Stacey M. Leyton
Eileen B. Goldsmith
Danielle E. Leonard
Robin S. Tholin
James Baltzer
ALTSHULER BERZON LLP
177 Post St., Suite 300
San Francisco, CA 94108
Tel: (415) 421-7151

By: /s/ Danielle E. Leonard


Attorneys for Plaintiff Organizations

¹ In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. Dkt. Nos. 35 and 36 shall be removed from the public docket.

DATED: **September 12, 2025**



HON. WILLIAM H. ALSUP
Senior United States District Judge